

**UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS**

MAURA O'NEILL, as administrator of the Estate
of Madelyn E. Linsenmeir,

Plaintiff,

v.

CITY OF SPRINGFIELD, *et al.*

Defendants.

ASSENTED-TO MOTION TO SEAL

Plaintiff Maura O'Neill, as administrator of the Estate of Madelyn E. Linsenmeir, respectfully moves for leave to file under seal the video exhibits to its opposition to the HCSD defendants' Motion for Summary Judgment. As grounds, the Estate states that the exhibits are videos that were produced by HCSD and designated CONFIDENTIAL-SUBJECT TO PROTECTIVE ORDER by HCSD pursuant to the stipulated protective order entered in this case. The Estate is accordingly required to move to file them under seal. D.E. 64 ¶6. The Estate moves that they be impounded until further order of the Court.

Counsel for all defendants assent to this motion.

February 15, 2024

Respectfully submitted,

/s/ Daniel L. McFadden

Jessie J. Rossman (BBO # 670685)
Daniel L. McFadden (BBO #676612)
American Civil Liberties Union
Foundation of Massachusetts, Inc.
One Center Plaza, Suite 850
Boston, MA 02108
(617) 482-3170

David Milton (BBO # 668908)
Prisoners' Legal Services of Massachusetts
50 Federal St.
Boston, MA 02110
(617) 482-2773

Martin M. Fantozzi (BBO # 554651)
Richard J. Rosensweig (BBO # 639547)
Julius Halstead (BBO # 705428)
Kiman Kaur (BBO #709943)
Goulston & Storrs PC
400 Atlantic Avenue
Boston, MA 02110
(617) 482-1776

Attorneys for Plaintiff

LOCAL RULE 7.1 CERTIFICATE

I hereby certify that counsel for plaintiff conferred with counsel for the defendants in a good-faith attempt to resolve or narrow the issues raised in this motion. Defendants assent to this motion.

Dated: February 15, 2024

/s/ Daniel L. McFadden

CERTIFICATE OF SERVICE

I hereby certify that this document will be served on all parties through the Court's CM/ECF system.

Dated: February 15, 2024

/s/ Daniel L. McFadden